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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 CARL BRADLEY,
13 Petitioner,
14 v.
15 ATTORNEY GENERAL OF THE STATE
OF NEVADA, *et al.*,
16 Respondents.
17

Case No. 2:13-cv-01196-RFB-GWF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
AMENDED PETITION FOR WRIT OF
HABEAS CORPUS**

(Third Request)

18 Petitioner Carl Bradley, by counsel, moves this Court for the entry of an Order
19 extending the time in which she must file an Amended Petition for Writ of Habeas
20 Corpus by 30 days from July 28, 2017 to, and including, August 28, 2017. This motion
21 is based on the attached points and authorities and the record.

22 **POINTS AND AUTHORITIES**

23 1. Counsel has completed a draft of Bradley's amended petition in line with
24 counsel's last request for an extension. However, difficulty communicating with
25 Bradley due to his location at USP Florence ADMAX in Florence, Colorado, has
26 continued to plague us.

1 2. Counsel and Bradley have been communicating by phone and letter.
2 Bradley has quickly responded to past requests for information.

3 3. During a telephone call with Bradley earlier this week, which ended
4 somewhat abruptly, counsel learned that Bradley never received one of her letters
5 seeking information.

6 4. The day of our telephone call, July 26, 2017, counsel sent Bradley a
7 follow-up letter, which, in part, reiterated the original request. The last letter counsel
8 sent that Bradley received took a week to reach him from the day counsel sent it.

9 5. The requested information, once received, will assist in the investigation
10 and help counsel determine whether a factual basis for one of Bradley's claims exists.
11 Should the investigation be fruitful, counsel will add the claim(s) to Bradley's
12 petition.

13 6. This request is not made for the purposes of delay, but rather in the
14 interests of justice, as well in Bradley's interests.

15 7. On July 28, 2017, counsel exchanged e-mails with Deputy Jeffrey
16 Connor, who does not object to this request, with the caveat that his lack of objection
17 is not to be construed as a waiver or concession of any kind.

18 8. For the reasons above, as well as the record in this case, Bradley
19 respectfully asks this Court to grant his request for an extension of time and enter
20 an order requiring the amended petition be filed on or before August 28, 2017.
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1 Dated this 28th day of July, 2017.

2 Respectfully submitted,

3 RENE L. VALLADARES
4 Federal Public Defender

5 /s/ Amelia L. Bizzaro
6 AMELIA L. BIZZARO
7 Assistant Federal Public Defender

8 IT IS SO ORDERED:

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10 RICHARD F. BOULWARE, II
11 United States District Judge

12 DATED this 1st day of August, 2017.

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Participants in the case who are registered CM/ECF users will be served by the CM/ECF system and include: JEFFREY M. CONNER.

Carl Bradley
No. 43838-048
USP Florence ADMAX
U.S. Penitentiary
PO Box 8500
Florence, CO 81226

/s/ Jessica Pillsbury
An Employee of the
Federal Public Defender